

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PA ADVISORS, LLC,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 2:07-cv-480-RRR
	§	
GOOGLE, INC., et al.,	§	
	§	JURY TRIAL DEMANDED
Defendants.	§	
	§§	

nXn TECH, LLC’S PROPOSED VERDICT FORM

nXn Tech, LLC (f/k/a PA Advisors, LLC) (“nXn”) files this separate verdict form that merely includes the same questions included in the post-trial jury instructions.

nXn reserves the right to revise, supplement, and otherwise amend this form as the case progresses through trial and through any additional pre-trial conferences with the Court concerning the specific matter of jury instructions.

INFRINGEMENT

Question No. 1A. Has nXn proven by, a preponderance of the evidence that Google directly infringes any claim of the Geller patent either literally or under the doctrine of equivalents?

YES _____

NO _____

If you answered "Yes" to this question, you must answer Question 2A.

Question No. 1B. Has nXn proven by, a preponderance of the evidence that Yahoo directly infringes any claim of the Geller patent either literally or under the doctrine of equivalents?

YES _____

NO _____

If you answered "Yes" to this question, you must answer Question 2B.

Question No. 2A. Please check all claims of the Geller patent that you find Google directly infringes, either literally or under the doctrine of equivalents, for each of the following Google Products.

Google Search

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

AdWords

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

Claim 45 _____

Claim 47 _____

AdSense for Search

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

Claim 45 _____

Claim 47 _____

Google's AdSense for Content

Claim 45 _____

Claim 47 _____

Question No. 2B. Please check all claims of the Geller patent that you find Yahoo! directly infringes, either literally or under the doctrine of equivalents, for each of the following Accused Yahoo! Products.

Yahoo! Sponsored Search

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

Yahoo! Content Match

Claim 45 _____

Claim 47 _____

Yahoo! Behavioral Targeting

Claim 45 _____

Claim 47 _____

Validity

Question No. 3A. Have Yahoo proven, by clear and convincing evidence, that claim 1 or claim 45 of the Geller patent is invalid for failure to satisfy the written description requirement?

YES _____

NO _____

If you answered “Yes” to this question, you must answer Question 4A.

Question No. 3B. Has Google proven, by clear and convincing evidence, that claim 1 or claim 45 of the Geller patent is invalid for failure to satisfy the written description requirement?

YES _____

NO _____

If you answered “Yes” to this question, you must answer Question 4B.

Question No. 4A. Please check which claims, if any, of the Geller patent that you find Yahoo has proven by clear and convincing evidence is invalid for failure to satisfy the written description requirement

Claim 1 _____

Claim 45 _____

Question No. 4B. Please check which claims, if any, of the Geller patent that you find Google has proven by clear and convincing evidence is invalid for failure to satisfy the written description requirement

Claim 1 _____

Claim 45 _____

Question No. 5A. Has Yahoo proven, by clear and convincing evidence, that Claim 1 or Claim 45 of the Geller patent is invalid for failure to satisfy the enablement requirement?

YES _____

NO _____

If you answered "Yes" to this question, you must answer Question 6A.

Question No. 5B. Has Google proven, by clear and convincing evidence, that Claim 1 or Claim 45 of the Geller patent is invalid for failure to satisfy the enablement requirement?

YES _____

NO _____

If you answered "Yes" to this question, you must answer Question 6B.

Question No. 6A. Please check which claims, if any, of the Geller patent that you find Yahoo has proven by clear and convincing evidence is invalid for failure to satisfy the enablement requirement

Claim 1 _____

Claim 45 _____

Question No. 6B. Please check which claims, if any, of the Geller patent that you find Google has proven by clear and convincing evidence is invalid for failure to satisfy the enablement requirement

Claim 1 _____

Claim 45 _____

Question No. 7A. Has Google proven, by clear and convincing evidence, that any claim of the Geller patent is obvious in light of one piece of prior art, or a combination of prior art references?

YES _____

NO _____

If you answered “Yes” to this question, you must answer Question 8A.

If you answered “No” to this question, skip to Question 9A (Damages: Reasonable Royalty).

Question No. 7B. Has Yahoo proven, by clear and convincing evidence, that any claim of the Geller patent is invalid in light of one piece of prior art, or a combination of prior art references?

YES _____

NO _____

If you answered “Yes” to this question, you must answer Question 8B.

If you answered “No” to this question, skip to Question 9B (Damages: Reasonable Royalty).

Question No. 8A. Please check those claims that you find that Google has proven by clear and convincing evidence are invalid because the claim was obvious in light of one piece of prior art, or a combination of prior art references?

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

Claim 45 _____

Claim 47 _____

Question No. 8B. Please check the those claims that you find that Yahoo has proven by clear and convincing evidence are invalid because the claim was obvious in light of one piece of prior art, or a combination of prior art references?

Claim 1 _____

Claim 3 _____

Claim 4 _____

Claim 6 _____

Claim 43 _____

Claim 45 _____

Claim 47 _____

Damages

Question No. 9A If you find any claim of the Geller patent to be infringed by Google and valid, state the amount of damages in the form of a reasonable royalty you find nXn has proven by a preponderance of the evidence.

= \$ _____

Question No. 9B If you find any claim of the Geller patent to be infringed by Yahoo and valid, state the amount of damages in the form of a reasonable royalty you find nXn has proven by a preponderance of the evidence.

= \$ _____

Willful Infringement

Question No. 10A. Has nXn proven, by clear and convincing evidence, that Google has willfully infringed the Geller patent?

YES _____

NO _____

Question No. 10B. Has nXn proven, by clear and convincing evidence, that Yahoo has willfully infringed the Geller patent?

YES _____

NO _____